

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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XL SPECIALTY INSURANCE COMPANY,

Interpleader-Plaintiff,

v.

ALBERT HALLAC, JEFFREY HALLAC, KEITH
WELLNER, WESTON FINANCIAL SERVICES LLC,
WESTON CAPITAL MANAGEMENT LLC, WESTON
CAPITAL ASSET MANAGEMENT LLC,

Interpleader-Defendants.
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Case No. 17-cv-2867

**SUPPLEMENTAL DECLARATION
OF J. CHRISTOPHER ALBANESE IN FURTHER SUPPORT OF
INTERPLEADER-DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

J. Christopher Albanese declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am an attorney at the law firm Gusrae Kaplan Nusbaum LLP ("GKN"). I and my firm are counsel to Interpleader-Defendant Albert Hallac ("Hallac") on various matters—civil and criminal—and have been his counsel since 2012. I have personal knowledge of the events described herein.

2. In response to requests by Wimbledon's investors in 2012, Albert Hallac offered assistance and information in understanding the transactions at issue.

3. As part of settlement discussions with Wimbledon, Hallac offered a \$25 million judgment in favor of Wimbledon and subsequently cash considerations.

4. At the time of those discussions, Hallac did not know about the criminal investigations, but the SEC action was public.

Dated: New York, New York
June 26, 2017

GUSRAE KAPLAN NUSBAUM PLLC

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